

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

RECEIVED
MAY 15 2015
SC Court of Appeals

Marvin H. Dukes, Master in Equity

Appellate Case No.: 2014-002290

JMT Capitol Holdings, LLC,

Plaintiff,

v.

VDM/T Land Company, LLC and
Daufuskie Island Properties, LLC,

Defendants.

And

Daufuskie Island Properties, LLC,
and its successor in interest, Ace
Basin Investments, LLC,

Appellant,

v.

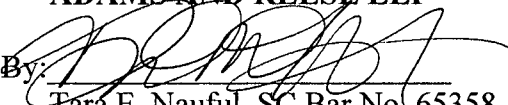
Raymond Travaglione,

Respondent.

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that the Final Brief of Respondent complies with
Rule 211(b), SCACR.

ADAMS AND REESE LLP

By: 

Tara E. Nauful, SC Bar No. 65358
Dawn M. Hardesty, SC Bar No. 80144
1501 Main Street, 5th Floor
Columbia, SC 29201
(803) 254-4190 Tel
(803) 779-4749 Fax
tara.nauful@arlaw.com
dawn.hardesty@arlaw.com

Attorneys for Respondent Raymond
Travaglione

May 15, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, Master in Equity

Appellate Case No. 2014-002290

RECEIVED
MAY 15 2015
SC Court of Appeals

JMT Capitol Holdings, LLC,

Plaintiff,

v.

VDM/T Land Company, LLC and
Daufuskie Island Properties, LLC,

Defendants.

And

Daufuskie Island Properties, LLC,
and its successor in interest, Ace
Basin Investments, LLC,

Appellant,

v.

Raymond Travaglione,

Respondent.

PROOF OF SERVICE

I, the undersigned, do hereby certify that on May 15, 2015, I caused the below named parties to be served with a copy of the following document(s):

- 1. Final Brief of Respondent; and**
- 2. Certificate of Compliance**

by causing said document(s) to be placed in a sealed envelope with postage thereon fully prepaid, in the United States mail, with return address clearly shown, as set forth below.

<p>Lindsey W. Cooper, Jr., Esq. The Law Offices of L.W. Cooper Jr., LLC 36 Broad Street Charleston, SC 29401</p> <p><i>Counsel to Daufuskie Island Properties, LLC, and its successor in interest Ace Basin Investments, LLC</i></p>	<p>Jannine M. Mutterer, Esq. West Olivetti, LLC P.O. Box 7906 Hilton Head Island, SC 29938</p> <p><i>Attorneys for VDM/T Land Company</i></p>
<p>Suzanne Taylor Graham Grigg, Esq. Jeffrey D. Locker, Esq. Nexsen Pruettt, LLC P.O. Drawer 2426 Columbia, SC 29202</p> <p><i>Attorneys for JMT Capital Holdings, LLC</i></p>	

ADAMS AND REESE LLP



Candice S. Carter
Paralegal to Tara E. Nauful
Post Office Box 2285
Columbia, South Carolina 29202-2285
(803) 254-4190 Tel.

May 15, 2015



Attorneys at Law

Alabama
Florida
Louisiana
Mississippi
South Carolina
Tennessee
Texas
Washington, DC

Dawn M. Hardesty

Direct: 803.212.4412
E-Fax: 803.212.1346
dawn.hardesty@arlaw.com

RECEIVED
MAY 15 2015
SC Court of Appeals

May 15, 2015

Via Hand-Delivery

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

Re: *JMT Capitol Holdings, LLC v. VDM/T Land Company, LLC and Daufuskie Island Properties, LLC; Daufuskie Island Properties, LLC and its successor in interest, Ace Basin Investments, LLC v. Raymond Travaglione*
Appellate Case No. 2014-002290
Adams and Reese File No.: 023270-000004

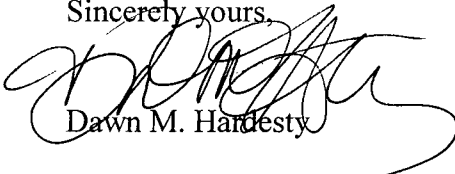
Dear Ms. Kitchings:

Please find enclosed for filing in the above-referenced matter the original (unbound) and fifteen (15) bound copies of the Final Brief of Respondent. Please file the original and return a filed copy to me via our courier.

Also, enclosed are the original and one (1) copy of the Certificate of Compliance with Rule 211(b), SCACR and Proof of Service. Please file the originals and return a filed copy to me via our courier.

If you have any questions, please feel free to contact me. Thank you for your assistance in this matter.

Sincerely yours,



Dawn M. Hardesty

Enclosures (as stated)

c (w/ enclosures): Lindsey W. Cooper, Jr., Esq. (via U.S. Mail)
Suzanne Taylor Graham Grigg, Esq. (via U.S. Mail)
Jeffrey D. Locker, Esq. (via U.S. Mail)
Jannine M. Mutterer, Esq. (via U.S. Mail)
Mr. Raymond Travaglione (via E-Mail)